

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,)
)
)
Petitioner,)
)
v.) CIVIL ACTION NO. SA-25-CV-00277
)
)
REAL PROPERTY LOCATED AND)
SITUATED AT:)
)
6817 19TH ROAD NORTH, ARLINGTON,)
ARLINGTON COUNTY, VIRGINIA)
)
)
Respondent.)

VERIFIED COMPLAINT FOR FORFEITURE

Comes now Petitioner United States of America, acting by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, pursuant to Rule G, Supplemental Rules of Federal Rules of Civil Procedure, and respectfully states as follows:

I.
NATURE OF THE ACTION

This action is brought by the United States of America seeking forfeiture to the United States of the property described below as:

Real Property, with all buildings, appurtenances, and improvements thereon, and any and all surface and sub-surface rights, title, and interests, located and situated at:

Lot numbered four (4), of the subdivision known as GALE H. STALKER'S PROPERTY, as the same appears upon a plat attached to a deed from Guy N. Church et al, to Gale H. Stalker dated October 4, 1935, and recorded in Deed Book 376 at Page 298 among the land records of Arlington County, Virginia.

Being the same property conveyed to Henry T. Trumble, III and Chantal N. Phillips, as tenants by the entirety with common law right of survivorship by deed from Henry T.

Trumble, III dated 11/23/2011 and recorded with Arlington County on 12/07/2011 in Book 4512, Page 870.

This conveyance is made subject to covenants, conditions, restrictions, easements and rights of way of record.

hereinafter the Respondent Real Property.

II.
JURISDICTION AND VENUE

Under Title 28 U.S.C. § 1345, the Court has jurisdiction over an action commenced by the United States, and under Title 28 U.S.C. § 1355(a), jurisdiction over an action for forfeiture. This Court has *in rem* jurisdiction over the Respondent Real Property under Title 28 U.S.C. §§ 1355(b) and 1395. Venue is proper in this district pursuant to Title 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in this District, and pursuant to Title 28 U.S.C. § 1355(b)(1)(B) and 1395(b), because the Respondent Real Property located in this District.

III.
STATUTORY BASIS FOR FORFEITURE

This is a civil forfeiture action *in rem* brought against the Respondent Real Property for violations of Title 18 U.S.C. §§ 1343, 1347, and 1956, and Title 42 U.S.C. § 1320a-7b which make the property subject to forfeiture to the United States pursuant to Title 18 U.S.C. § 981(a)(1)(A) and (C), which states (with emphasis added):

§ 981. Civil forfeiture

- (a)(1) The following property is subject to forfeiture to the United States:
(A) Any property, real or personal, involved in a transaction or attempted transaction in violation of section 1956, 1957 or 1960 of this title, or any property traceable to such property.

- (C) Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting “*specified unlawful activity*” (as defined in section 1956(c)(7) of this title), or a *conspiracy* to commit such offense.

IV.
FACTS IN SUPPORT OF FORFEITURE

See Appendix A for facts under seal and are incorporated here by reference.

V.
PRAYER

WHEREFORE, Petitioner, United States of America, prays that due process issue to enforce the forfeiture of the Respondent Real Property, that due notice pursuant to Rule G(4) be given to all interested parties to appear and show cause why forfeiture should not be decreed,¹ that an order be entered to command the Federal Bureau of Investigation and the United States Marshals Service to post the Notice of Complaint for Forfeiture in accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., and Title 18 U.S.C. § 985(c)(1)(B), that the Respondent Real Property be forfeited to the United States, and that the Respondent Real Property be disposed of in accordance with the law, and for any such further relief as this Honorable Court deems just and proper.

Respectfully submitted,

MARGARET F. LEACHMAN
Acting United States Attorney

By: 

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¹Appendix A, which is being filed along with this complaint, will be sent to those known to the United States to have an interest in the Respondent Real Property.

VERIFICATION

Special Agent Michelle Walker, declares and says that:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), Complex Financial Crimes Squad at the FBI Field Office in San Antonio, Texas, and am the investigator responsible for the accuracy of the information provided in this litigation; and
2. I have read the above Verified Complaint for Forfeiture and know the contents thereof; that the information contained in the Verified Complaint for Forfeiture has been furnished by official government sources; and based on information and belief, the allegations contained in the Verified Complaint for Forfeiture are true.

Pursuant to Title 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of March, 2025.



Michelle Walker, Special Agent
Federal Bureau of Investigation
Financial Crimes Squad
FBI Field Office, San Antonio